

1 ERIC J. TROUTMAN (State Bar No. 229263)
e jt@severson.com
2 IVETTE ZAMORA (State Bar No. 286243)
iz@severson.com
3 SEVERSON & WERSON
A Professional Corporation
4 The Atrium
19100 Von Karman Avenue, Suite 700
5 Irvine, California 92612
Telephone: (949) 442-7110
6 Facsimile: (949) 442-7118

7 MARK D. LONERGAN (State Bar No. 143622)
mdl@severson.com
8 SEVERSON & WERSON
A Professional Corporation
9 One Embarcadero Center, Suite 2600
San Francisco, California 94111
10 Telephone: (415) 398-3344
Facsimile: (415) 956-0439

11 Attorneys for Defendant
12 WELLS FARGO BANK, N.A.

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 FELICIA LONGMIRE,
16 Plaintiff,

17 vs.

18 WELLS FARGO BANK, N.A.,
19 Defendant.

Case No. 3:15-cv-00928-EMC
Hon. Edward M. Chen

**JOINT MOTION TO EXTEND
TIME TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS**

20
21 Action Filed: March 2, 2015
22 Trial Date: None Set
23
24
25
26
27
28

1 TO ALL PARTIES HEREIN AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

2 The complaint in this matter was served on defendant Wells Fargo Bank,
3 N.A. ("Wells Fargo") on March 2, 2015. Based on this service date, defendant
4 Wells Fargo's response to the complaint would have been due on April 24, 2015.

5 Plaintiff Felicia Longmire and Wells Fargo agree and stipulate that Wells
6 Fargo's response to the complaint shall now be due on May 22, 2015.

7 SO STIPULATED.

8 DATED: April 21, 2015

SEVERSON & WERSON
A Professional Corporation

11 By: /s/ Ivette Zamora

12 IVETTE ZAMORA

13 Attorneys for Defendant WELL'S FARGO
14 BANK, N.A.

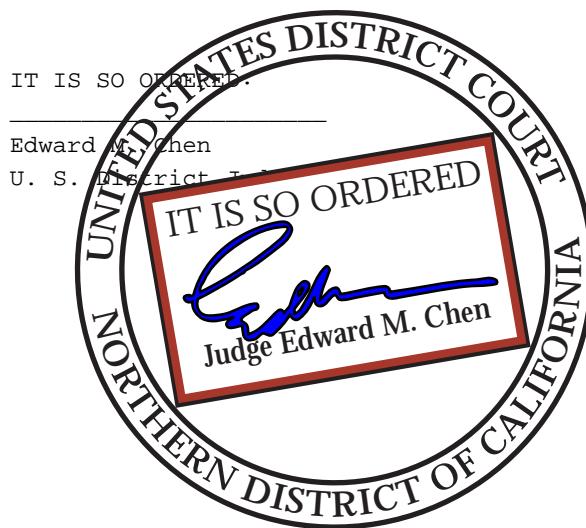
15 DATED: April 21, 2015

KROHN & MOSS, LTD

18 By: /s/ Ryan Lee

19 RYAN LEE

20 Attorneys for Plaintiff FELICIA LONGMIRE



1 **PROOF OF SERVICE**

2 At the time of service, I was over 18 years of age and not a party to this
3 action. I am employed in the County of Orange, State of California. My business
4 address is The Atrium, 19100 Von Karman Avenue, Suite 700, Irvine, CA 92612.

5 On April 21, 2015, I served true copies of the following document(s):

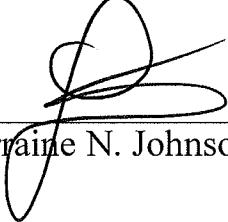
6 **JOINT MOTION TO EXTEND TIME TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE THAN 30 DAYS** on the interested parties in this
action as follows:

7 Ryan Scott Lee Attorney for Plaintiff Felicia Longmire
8 Matthew A Rosenthal
9 Krohn & Moss, LTD
10 10474 Santa Monica Boulevard Tel: (323) 988-2400
11 Suite 401 Fax: (866) 583-3695
12 Los Angeles, CA 90025
13 Email: rlee@consumerlawcenter.com
14 Email:
15 mrosenthal@consumerlawcenter.com

16 **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed
the document(s) with the Clerk of the Court by using the CM/ECF system.
Participants in the case who are registered CM/ECF users will be served by the
CM/ECF system. Participants in the case who are not registered CM/ECF users will
be served by mail or by other means permitted by the court rules.

17 I declare under penalty of perjury under the laws of the United States of
America that the foregoing is true and correct. I declare that I am employed in the
18 office of a member of the bar of this Court at whose direction the service was made.

19 Executed on April 21, 2015, at Irvine, California.

20 
Lorraine N. Johnson